

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KELLY BROWN and TIFFANY STEWART,
Individually and on behalf of all others similarly
situated, as Class/Collective representatives,

Plaintiffs,

v.

BARNES AND NOBLE, INC.,

Defendant.

Case No. 16-CV-07333 (RA)

DECLARATION OF DANIEL H. AIKEN

I, DANIEL H. AIKEN, declare pursuant to 28 U.S. C. § 1746 as follows:

1. Attached as Exhibit A is a true and correct copy of Café Manager Job Description.
2. Attached as Exhibit B is a true and correct copy of Café Manager Competency Model.
3. Attached as Exhibit C is a true and correct copy of Margaret Mann's Performance Review for the period April 28, 2013 through May 3, 2014.
4. Attached as Exhibit D is a true and correct copy of Kelly Brown's Performance Review for the period May 1, 2012 through April 27, 2013.
5. Attached as Exhibit E is a true and correct copy of Kelly Brown's Performance Review for the period April 28, 2013 through May 3, 2014.
6. Attached as Exhibit F is a true and correct copy of Christopher Corrado's Performance Review for the period April 28, 2013 through May 3, 2014.

7. Attached as Exhibit G is a true and correct copy of Christopher Corrado's Performance Review for the period May 4, 2014 through May 2, 2015.

8. Attached as Exhibit H is a true and correct copy of Margaret Mann's Performance Review for the period May 1, 2011 through April 28, 2012.

9. Attached as Exhibit I is a true and correct copy of Margaret Mann's Learning Plan.

10. Attached as Exhibit J is a true and correct copy of an August 17, 2013 email from Kelly Brown to Barnes & Noble Sherman Plaza re: Reviews for Nora.

11. Attached as Exhibit K is a true and correct copies of various emails from Kelly Brown which are bates stamped Plaintiffs00041., Plaintiffs00045, Plaintiffs00049, Plaintiffs00050, Plaintiffs00052, Plaintiffs00053, Plaintiffs00054, Plaintiffs00033, Plaintiffs00034, Plaintiffs00035, Plaintiffs00036, Plaintiffs00037, Plaintiffs00038, Plaintiffs00039 and Plaintiffs00040.

12. Attached as Exhibit L is a true and correct copy of Declaration of Erika Pitts.

13. Attached as Exhibit M is a true and correct copy of Declaration of Christina Perleberg.

14. Attached as Exhibit N is a true and correct copy of Declaration of Cullen Bealer.

15. Attached as Exhibit O is a true and correct copy of Declaration of Melissa Stanley.

16. Attached as Exhibit P is a true and correct copy of Declaration of Tara Scully.

17. Attached as Exhibit Q is a true and correct copy of Declaration of Emily Lorbach.

18. Attached as Exhibit R is a true and correct copy of Declaration of Kyle Egan.

19. Attached as Exhibit S is a true and correct copy of Declaration of Katie Downs.

20. Attached as Exhibit T is a true and correct copy of Declaration of Tra Dinh.

21. Attached as Exhibit U is a true and correct copy of Declaration of Marissa Grenat.

22. Attached as Exhibit V is a true and correct copy of Declaration of Tina

Wakefield.

23. Attached as Exhibit W is a true and correct copy of Declaration of Rebecca

Nelms.

24. Attached as Exhibit X is a true and correct copy of Declaration of Ryan Cardwell.

Executed on this 25th day of January 2017, at Philadelphia, Pennsylvania

s/Daniel H. Aiken
Daniel H. Aiken